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Sent: 9/19/2018 6:26:05 PM
To: trefiak@targetemission.com
Subject: Applicability to AWP for OOOOa

Terence,

60.18(g) states that paragraphs (g), (h), and (i) of 60.18 apply to all equipment for which the applicable subpart requires monitoring with a 40 CFR part 60, Appendix A-7, Method 21 monitor, except for closed vent systems, equipment designated as leakless, and equipment identified as having no detectable emissions....An owner or operator may use an optical gas imaging instrument instead of a 40 CFR part 60, Appendix A-7, Method 21 monitor.

Newer subparts include a table that indicates which portions of the General Provisions apply. This is used when the rule supersedes the General Provisions. NSPS VV/VVa did not include this table, which indicates the entire General Provisions apply to the rule, in addition to the requirements in the subparts. NSPS OOOO/OOOOa do include a table. In that table, we indicated that 60.18 applies to the subpart in its entirety. Where we only apply a portion of the General Provisions, we include an explanation of what does and does not apply. Below is the table for NSPS OOOOa. Let me know if you have any other questions.

TABLE 3 TO SUBPART OOOOa OF PART 60—APPLICABILITY OF GENERAL PROVISIONS TO SUBPART OOOOa

General provisions citation	Subject of citation	Applies to subpart?	Explanation
§60.1	General applicability of the General Provisions	Yes	
§60.2	Definitions	Yes	Additional terms defined in §60.5430a.
§60.3	Units and abbreviations	Yes	
§60.4	Address	Yes	
§60.5	Determination of construction or modification	Yes	
§60.6	Review of plans	Yes	
§60.7	Notification and record keeping	Yes	Except that §60.7 only applies as specified in §60.5420a(a).
§60.8	Performance tests	Yes	Performance testing is required for control devices used on storage vessels, centrifugal compressors and pneumatic pumps.
§60.9	Availability of information	Yes	
§60.10	State authority	Yes	
§60.11	Compliance with standards and maintenance requirements	No	Requirements are specified in subpart OOOOa.
§60.12	Circumvention	Yes	
§60.13	Monitoring requirements	Yes	Continuous monitors are required for storage vessels.

§60.14	Modification	Yes	To the extent any provision in §60.14 conflicts with specific provisions in subpart OOOOa, it is superseded by subpart OOOOa provisions.
§60.15	Reconstruction	Yes	Except that §60.15(d) does not apply to wells, pneumatic controllers, pneumatic pumps, centrifugal compressors, reciprocating compressors or storage vessels.
§60.16	Priority list	Yes	
§60.17	Incorporations by reference	Yes	
§60.18	General control device and work practice requirements	Yes	
§60.19	General notification and reporting requirement	Yes	

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